Federal Communications Commission Washington, D.C.

March 21, 2000

DOCKET FILE COPY ORIGINAL

Ted M. Coopman 2501 Friesland Court Santa Cruz, CA 95062

Re: Acceptance of Motion As Timely Filed in (Docket No. 99-325)

The Office of the Secretary has received your request for acceptance of your pleading in the above-referenced proceeding as timely filed due to operational problems with the Electronic Comment Filing System (ECFS). Pursuant to 47 C.F.R. Section 0.231(I), the Secretary has reviewed your request and verified your assertions. After considering arguments, the Secretary has determined that this pleading will be accepted as timely filed.

However, Motions for Extensions of Time for the Reply Comment period are within the discretion of the bureau. We have forwarded your request in this regard to the

bureau for their consideration. If we can be of further assistance, please contact our office.

FEDERAL COMMUNICATIONS COMMISSION

For Magalie Roman Salas

Secretary

Ted M. Gaptian 2501 Friesland Court Santieruz, & A 95062 831-477-7780

February 23, 2000

Ms. Magalie Roman Salas, Secretary Federal Communications Commission Office of the Secretary 445-12th Street, SW, Room TW-204B Washington, DC 20554.

Re:MOTION FOR EXTENSION OF REPLY-COMMENT PERIOD FOR 99-325 DUE TO FAILURE OF ECFS SYSTEM TO ALLOW ACCESS TO COMMENTS. Please Accept this motion as Accepted for Timely Filing due to failure of ECFS systems.

Dear Ms. Salas,

Enclosed are the required 10 copies of my request for an extension on the Reply Comment period for 99-325 and a motion as accepted for Timely Filing due to failure of ECFS systems.

I thank you. Sincerely,

Ted M. Coopman

No. of Copies rec'd O+10 List ABCDE Before the

ELDERAL COMMUNICATIONS COMMISSION

Washington, DC 20554

In the Matter of Digital Audio Broadcasting Systems and Their Impact On the Terrestrial Radio
MIM Docket No. 99-325

Broadcast Service

My name is Ted M. Coopman and I am a resident of Santa Cruz, CA. I have a Master of Science in Mass Communications from San Jose State University (1995) and have been researching broadcasting since 1993. I have presented numerous papers on this subject at professional conventions held by the National Communication Association, the American Communication Association, the Western Communication Association, and the Southern States Communication Association. I have also had a manuscript published in the Journal of Broadcasting and Electronic Media (Vol. 43, No. 4, Fall 1999) and operate a website(www.roguecom.com.rogueradio) where I house my research on broadcasting. I am also the co-founder of Rogue Communications, a multi-service consulting and research company. In these capacities, I have become concerned with the state of radio broadcasting in the United States. Our current free radio service is threatened by media consolidation, the loss of diversity, localism and the increased use of EM spectrum for ancillary services to the detriment of music and voice broadcasting.

MOTION FOR EXTENSION OF REPLY-COMMENT PERIOD FOR 99:325
DUE TO FAILURE OF ECFS SYSTEM TO AI LOW ACCESS TO COMMENTS.
Please Accept this motion as Accepted for Timely Filing due to failure of ECFS systems.

The ECFS has been down or inaccessible for almost two weeks. The ECFS system has been generally uncooperative as early as 2/1.00. This prevents reading the comments on IBOC Digital Audio Broadcasting (IBOC DAB) proposals for Docket 99-325, to which we would reply. Prospective reply commenters could not do research due to failure of ECFS to provide readable Adobe files. One cannot comment intelligently on what one cannot read. As a filer during the comment period, I was unable to respond because of the inaccessibility of critical material. I therefore support the request for an extension of the Reply comments period until May 1, 2000.

Sincerely.

And M. Coopman 2-23-2-

MAR 8 2000 FCC MAIL ROO!"